

CHALOS & Co. P.C.

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May 17, 2024

Via Electronic Filing

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

Dated: May 17, 2024

The conference is adjourned to May 29, 2024 at 11:00 A.M.

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

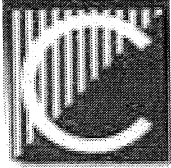
**Re: Techtronic Cordless GP v Maersk A/S
Case No. 1:23-cv-2739-PGG
Letter Motion for Adjournment of Conference or Telephone Conference**

Dear Judge Gardephe,

Plaintiff Techtronic Cordless GP (hereinafter "Plaintiff"), by and through undersigned counsel, respectfully submits this joint letter motion pursuant to Section I.D. of this Honorable Court's individual practices to request an adjournment of the May 22, 2024 Conference, or in the alternative, to have the conference converted to a telephone conference. In support thereof, the Parties respectfully shows as follows:

Counsel for the parties continue to work in good faith on resolving this matter as soon as possible. A complicating factor is that Plaintiff and Defendant must satisfy all of the questions and accompanying paperwork required for the third-party contractual partners and interested underwriters which must sign-off on a final agreement. Undersigned counsel was planning to travel to New York to be in attendance at the conference set for May 22, 2024. Yesterday afternoon, May 16, 2024, a significant storm cut through Houston, Texas (with hurricane and tornado force winds). The storm took down three (3) large trees at our Houston office, landing on the roof of the building, and disconnecting power, internet, and the firm's server. It is unclear when service providers will be able to restore power¹ and undersigned counsel may need to coordinate with adjuster(s) and other providers for any property damage through next week. Accordingly, it is respectfully requested that the conference be adjourned to May 29, 2024. Counsel for Maersk A/S agrees to and joins in the request.

¹ See e.g., <https://apnews.com/article/houston-texas-severe-weather-storms-d14447267de0a8900e1475a8ad7ed8ba>.



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Counsel is also available to discuss by telephone and answer any questions the Court may have. In advance, we thank the Court for its consideration of the request.

Respectfully submitted,

Chalos & Co, P.C.

Briton P. Sparkman

Enc.

cc: Via ECF

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